

ABD/USAO#2014R00483

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2015 JAN 15 PM 4:06

UNITED STATES OF AMERICA

v.

ELIOT KNECHT FRIEDMAN,
Defendant.

* CLERK'S OFFICE
* AT BALTIMORE
* Criminal No. JKB-15-1019
* BY _____ DEPUTY
* (Distribution of Child Pornography,
* 18 U.S.C. § 2252(a)(2); Possession of Child
* Pornography, 18 U.S.C. § 2252A(a)(5)(B);
* Forfeiture, 18 U.S.C. § 2253)

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COUNT ONE

(Distribution of Child Pornography)

The Grand Jury for the District of Maryland charges that:

On or about June 27, 2014, in the District of Maryland, the defendant,

ELIOT KNECHT FRIEDMAN,

did knowingly distribute any visual depiction using any means and facility of interstate and foreign commerce, and that had been mailed, shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been so mailed, shipped and transported, by any means including by computer, the production of which involved the use of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and such depiction being of such conduct, that is, the defendant distributed a visual depiction of a minor engaged in sexually explicit conduct, including, but not limited to, files with the following titles: (1) "LS Model 7. (29).jpg", an image file that depicts a naked prepubescent female with her legs spread exposing her genitalia to the camera, the prepubescent female's left arm is resting on her thigh and the prepubescent female's genitalia is the focus of the image; and (2) "LS Model 7. (62).jpg", an image file that depicts the same prepubescent female doing a back bend, in which the focus of the image is the prepubescent female's genitalia.

18 U.S.C. §§ 2252(a)(2) & 2256

COUNT TWO

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about July 22, 2014, in the District of Maryland, the defendant,

ELIOT KNECHT FRIEDMAN,

did knowingly possess and knowingly access with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant did possess a Dell desktop computer, serial number 8H3G2D1, made in China, containing a Seagate hard drive, serial number 5XW2LCM2, made in China, that contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct, including, but not limited to, files with the following titles: (1) "L1-n2-50.jpg", an image file that depicts a naked prepubescent female kneeling before a prepubescent male and in which the prepubescent female's mouth is on the penis of the prepubescent male and the prepubescent male's left hand is on the head of the prepubescent female; and (2) "l1-c1-28.jpg", an image file that depicts a prepubescent female, naked from the waist down, sitting on the chest of a minor and the minor is performing oral sex on a prepubescent female.

18 U.S.C. §§ 2252A(a)(5)(B)

COUNT THREE

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about July 22, 2014, in the District of Maryland, the defendant,

ELIOT KNECHT FRIEDMAN,

did knowingly possess and knowingly access with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant did possess a Western Digital hard drive, 250GB, serial number WCANKH584897, made in Thailand, that contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct, including, but not limited to, files with the following titles: (1) "Olya – PREVIEW (12 seconds).mpg", a moving digital image file that depicts a naked prepubescent female sitting on a bed with her legs spread and, as the video continues, it zooms in close to the prepubescent female's genitalia; and (2) "k004 – PREVIEW (11 seconds)1.mpg", a moving digital image file that depicts a naked minor female lying on a bed with her legs spread in which the minor female's left hand is on her chest and her right hand is rubbing her genitalia and as the movie continues, the camera zooms in on the minor female's genitalia.

18 U.S.C. §§ 2252A(a)(5)(B)

COUNT FOUR

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about July 22, 2014, in the District of Maryland, the defendant,

ELIOT KNECHT FRIEDMAN,

did knowingly possess and knowingly access with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant did possess a Western Digital hard drive, 500GB, serial number WCAPW3101824, made in Thailand, that contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct, including, but not limited to, files with the following titles: (1) "Galia_98 PREVIEW – 8 secs1.avi", a moving digital image file that depicts a naked prepubescent minor lying on a bed with her knees bent and her legs spread exposing her genitalia to the camera, in which the prepubescent female is rubbing both of her hands all over her body including her genitalia; and (2) "Vika1 – PREVIEW (12 seconds)1.mpg", a moving digital image file that depicts a minor female sitting on a ledge with her legs spread and the focus of the video is the minor female's genitalia.

18 U.S.C. §§ 2252A(a)(5)(B)

COUNT FIVE

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further charges that:

On or about July 22, 2014, in the District of Maryland, the defendant,

ELIOT KNECHT FRIEDMAN,

did knowingly possess and knowingly access with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which image had been mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and which was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant did possess a Fujifilm DVD-R, made in Taiwan, that contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct, including, but not limited to, files with the following titles: (1) "lsh-001-064.jpg", an image file that depicts a close up of a prepubescent female's genitalia; and (2) "lsh007-058.jpg", an image file that depicts a prepubescent female from the waist down in which he prepubescent female is wearing a pink ruffle tutu and the prepubescent female's genitalia is exposed to the camera and is the focus of the image.

18 U.S.C. §§ 2252A(a)(5)(B)

FORFEITURE

The Grand Jury for the District of Maryland further charges that:

1. The allegations of Counts One through Five of this Indictment are incorporated here.
2. As a result of the offenses set forth in Counts One through Five of the Indictment in this case, the defendant,

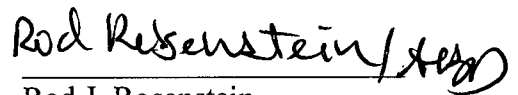
ELIOT KNECHT FRIEDMAN,

shall forfeit to the United States his interest in all property, real and personal, (1) that was used and intended to be used to commit and to promote the commission of offenses in Counts One through Five, and any property traceable to such property, including but not limited to the following:

- a. Dell desktop computer, serial number 8H3G2D1, made in China, containing a Seagate hard drive, serial number 5XW2LCM2, made in China; and
- b. Western Digital hard drive, 250GB, serial number WCANKH584897, made in Thailand; and
- c. Western Digital hard drive, 500GB, serial number WCAPW3101824, made in Thailand; and
- d. Fujifilm DVD-R, made in Taiwan.

as well as any property used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property, or (2) that constitutes or traceable to gross profits or other proceeds obtained, directly or indirectly, as a result of the offense in Counts One through Five.

18 U.S.C. §§ 2253


Rod J. Rosenstein
United States Attorney

A TRUE BILL

SIGNATURE REDACTED

Date: January 12, 2015